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ABSTRACT

In both France and Germany, the government, employers' organizations, and unions all participate in defining vocational diplomas based on a national framework of procedures of elaborating and standardizing titles. Important differences between the diploma definition processes in France and Germany may be identified. In Germany, the issue is training within a given trade, whereas in France, certification corresponds to a job level rather than to a specific job. The scope of reforms designed to adapt training to new production requirements has been relatively homogeneous in Germany. The diversity of the categories of French diplomas and the various levels with which they are associated make definition of fields much more complex in France than in Germany. Revision of training is also occurring much more rapidly in France than in Germany. In Germany, the organization of vocational training is based on the action of "private governments" formed by management, unions, and chambers of commerce, whereas in France, processes of reform proceed from the initiative of the state or powerful employer federations. In Germany, experts function as mediators and moderators of the diploma definition process, whereas in France, they are used to legitimize choices made during the process. (MN)

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THE DEFINITION OF VOCATIONAL DIPLOMAS IN GERMANY AND FRANCE

In both Germany and France, the government, employers' organisations and unions all participate in the definition of vocational diplomas. This process takes specific forms in each of the two countries, however. Thus, the nature of the diploma itself, the respective role of each partner, and the rhythm of the reforms are quite different on the two sides of the Rhine. The recognition of the diplomas, moreover, attests to the tensions within the two certification systems, both of which are confronted by growing economic and social instability.

The definition of vocational diplomas in France and Germany is based on similar general principles that set them apart from the traditional Anglo-Saxon systems, notably the national framework for procedures of elaborating and standardising titles, beyond any local considerations.[1] However, the meaning of this procedure differs considerably according to the specific way that these principles are applied.

FIELD AND PACE OF DIPLOMA REFORM

A first basic difference deals with what is to be defined. The terms used are quite revealing–in France, what is established is a "diploma" within a hierarchy of titles, going from the CAP (vocational aptitude certificate) to the BTS (higher technician certificate); in Germany, the issue is training within a given trade (*Ausbildungsberuf*, literally a "learned trade").

In France, the objective is first of all to define a grid for certification, whatever the form of preparation (school based, apprenticeship, or continuing training). "The issue is not defining a training programme but the competences to be verified in an exam," according to Benoît Bouyx of the French Ministry of Education's Division of High Schools and Middle Schools.[2] This certification does not correspond to a specific job but rather to a job level, characterised as an "occupational target". The French vocational diploma has another, equally important objective, which is that of allowing the diploma-holder to continue his or her studies within a given stream.

On the other side of the Rhine, the issue is the development of training guidelines corresponding to a central structure for acquiring knowledge–the "dual system" that operates within the context of alternating training between company and public vocational school. It leads to a certificate whose title refers to a trade rather than a professional field. Thus, for example, the certificate of "industrial mechanic, production techniques option" in Germany corresponds to the French "vocational *baccalauréat* in industrial automation". The concept of a professional field also exists in the German dual system, however: it corresponds to the basic knowledge common to related specialisations that are acquired in the first year of training. The "learned trade," meanwhile, is defined as an indivisible, singular, structured ensemble of occupational competences. But the German title is not conceived as leading to the continuation of initial studies in a given vocational stream.

THE ADAPTATION OF TRAINING TO NEW PRODUCTION REQUIREMENTS

In Germany, the scope of the reforms is relatively homogeneous. Except for a few cases of two-level accreditation (*Stufenausbildung*), a single title validates training in a given speciality. There is, however, a form of hierarchy among the "dual" certificates, and this obeys a logic that is more horizontal than vertical insofar as it is based on the trade studied. The diversity of the categories

1. For France, this includes all the diplomas for technical and vocational training, and for Germany, the certificates obtained following apprenticeship in the dual system. The term *diploma* is used for both countries, although it is not well suited to the reality of German certifications.
2. Participant in the joint LEST-Céreq seminar on "Negotiation and Constitution of Vocational Diplomas". (See Box page 3.)

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of French diplomas (vocational aptitude and vocational studies certificates, vocational *baccalauréat*, technician's certificate, vocational certificate, technical *baccalauréat*, higher technician's certificate, etc.), and above all the various levels with which they are associated, make the definition of the field more complex. In this respect, the increase in the number of vocational diplomas offered in all the training specialities in France goes against the rationalisation carried out over the last thirty years in Germany, which has led to a reduction of one-third in the number of recognised certificates.

It is also symptomatic that the higher level of vocational training acquired in France has led to the creation of new diplomas, as typified by the vocational *baccalauréat*, while in Germany, the response to new "productive" demands has until now been integrated into the existing structure by a transformation of training guidelines. These mechanisms for transforming basic vocational training programmes, internally in the German case and externally in France, are accurate reflections of the dominant forms of adjustment in each country. Germany's "organic" adjustment makes it easier to preserve the coherence of the system and thus the quality of economic and social coordination. French-style structural adjustment clearly allows major transformations to be accomplished with great speed. But it runs an undeniable risk in terms of the effectiveness of the new orientations, given the functioning of the labour market and the organisational characteristics of the companies which change less quickly than the content of the guidelines might suggest.

REVISING TRAINING CONTENT

The revision of training content seems to take place much more rapidly in France than in Germany. Each year, a hundred or so cases are examined within permanent bodies responsible for updating diplomas (the vocational advisory committees or CPC). In Germany, this task is delegated to ad hoc commissions whose creation depends on the social partners' prior agreement concerning the revision of training programmes. The amount of time required by this process–which is extremely long in certain cases (notably for training in metallurgy)–has led the federal authorities to recommend a limit of two years for a given diploma.

This relative slowness is due to the need for the parties involved to reach the consensus required in the elaboration of statutory training programmes. German-style consensus is hardly a given, but rather the result of a process involving very different social interests. The slowness of the German process is further increased by frequent reticence on the part of management representatives, for whom any reform necessarily signifies an additional investment in the creation of new training programmes that must be approved by the companies.

The pace of reforms, which is specific to each country, brings out a different set of priorities in the necessary tradeoff between two antagonistic goals–on the one hand, remedying the risk of obsolete training programmes and, on the other, preserving sufficiently stable qualifications guidelines for the actors in the training-employment relationship. Also at stake are the two systems' relative abilities to confront an increasing economic instability that tends to reduce the value of institutional mechanisms, which are inevitably long term. From this point of view, the German system demonstrates less flexibility, notably for moving towards new tertiary jobs, as in the area of services to private individuals.

ACTORS AND EXPERTS

In both countries, the development of vocational diplomas involves three major partners: government, employers' organisations and unions. What is formally a tripartite structure assumes a considerably different content, however, in function of the role that each of these categories of actors is led to play in the process of creating training guidelines.

Two Countries, Two Forms of Tripartite Organisation

The organisation of vocational training in Germany follows a "neocorporatist" kind of regulation based on the action of "private governments" formed by management, the unions, and the chambers of commerce, to whom the State delegates management of this public entity. Such delegation relies on a particular kind of "private" training supply, since producers and users are one and the same–the companies. This form of "neocorporatist" regulation constitutes an intermediate solution between management by the government and management by the market or, more precisely, it draws on both to create a subtle compromise. Thus, the partners in each branch develop a "common regulation" endeavouring to define within the same process both the content of in-company training and the kind of qualification produced, while acting within the context of federal legislation and market regulation of the supply of apprenticeship openings.

In France, processes of reform are more unilateral, proceeding from the initiative of either the State or powerful employers' federations. The role of the unions seems less visible. The State, which is omnipresent in both the conception of diplomas and the implementation of training programmes, also seeks to represent the demand of families in the reforms it undertakes. The expression of this social demand is more difficult to identify in the German process of defining certifications, where debate focuses more directly on economic issues–the relevance of the vocational qualifications conferred by the training in view of the organisation of work and the "demands" of competitiveness, or the determination of the wage relation (classification, careers, remuneration). Indeed, it is worth noting that, at the most crucial moments, the main government actor in Germany is the ministry of the economy, as was the case, for example, when the reforming of training programmes in the metallurgical industry was the subject of a direct conflict between the social partners.

A "Government" of Experts?

The role of experts, which is important in both countries, also takes rather different forms. In Germany, the expert is

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the mediator and moderator of the process. Thus, the expertise of the Federal Institute for Vocational Training (BIBB), which is subordinated to discussions between social partners, may even be refused by the latter if its recommendations seem too far removed from the realities of training in the company. In France, expertise, which comes largely from within the government, assumes primary importance as a form of legitimation for choices made at two points during the process–the determination of the appropriateness of the reforms (by the secretariat of the CPCs) and the determination of guidelines (by the national inspectorate).

In Germany, discussion of the content of vocational training closely depends on the expression of social interests: the unions seek the broadest possible training in order to favour the apprentice's subsequent autonomy, while the employers advocate training that is directly operational and thus narrower. In France, the debates focus more directly on technical and pedagogical issues. However, the arguments put forth by the actors vary considerably according to the origin of the demand for the constitution of the diploma, such as an initiative of the educational system itself, a request from a powerful employers' federation, or competition and compromise between two groups of employers. In addition, French negotiation of diplomas has to integrate considerations of educational streams (with titles going from CAP to BTS for a given specialisation). This situation makes the institutional process that much more complicated since the demand for the creation of a new diploma equal to or above the *baccalauréat* may have more to do with affirming the identity of the occupation involved than with seeking competences at the designated level.

In addition, the model of the large "hi-tech enterprise" clearly has a more normative impact on the conception of vocational training in France than in Germany. Several reasons underly this difference, and notably the very idea of "guideline".

In France, this determines a professional and pedagogical optimum that tends to constitute a closed entity, while in Germany, training rules in the company set minimal norms that allow greater diversification in the implementation of training according to the circumstances of the company, small or large. The concept of optimum is more justified in the French case insofar as it determines the possibility of continued study for a diploma at a higher level. The significant difference in success rates for examinations (close to 20 % higher for young Germans) is not irrelevant to this feature.

Today, the configurations of both systems are becoming increasingly unstable, with a loss in the representativeness of the social partners and a tendency for young people to choose general studies rather than vocational training. In the German case, a sharp debate opposes supporters of the dual system, who bank on its ability to adapt, and its detractors, who insist on its increasing failure to meet the new requirements of the production system (transversal skills, development of abstract reasoning faculties). The erosion of the authority and legitimacy of the intermediate organisations may be observed, which tends to weaken "neocorporatist" regulation.

Seminar on the Negotiation and Creation of Vocational Diplomas

The establishment of vocational training and its linkage with the labour market in France and Germany have already been the subject of many studies, but comparative analyses focusing on the creation of vocational diplomas and the actors involved remain rare. The observation of a clear proximity in the institutional contexts in which these diplomas are elaborated in the two countries thus gave rise to an effort to bring together German and French researchers in the context of a seminar entitled "Negotiation and Creation of Vocational Diplomas".

This article draws on papers and discussions from this seminar, which was held within the framework of the CNRS programme on "Education and Training in Europe". Organised in May 1996 by the Laboratoire d'économie et de sociologie du travail (LEST) in collaboration with Céreq, it benefitted from the financial support of the Ministry of Education's Division of High Schools and Middle Schools (DLC) and the Deutsche Forschungsgemeinschaft. The proceedings of this seminar will be published shortly by L'Harmattan.

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VOCATIONAL DIPLOMAS AND COLLECTIVE AGREEMENTS

In the branches studied, metallurgy and chemicals, and more broadly in the activities where classification grids have been set up in France, the mechanisms for recognising diplomas are fairly similar in Germany and France. In both cases, these are subordinated to the fact of holding a post that corresponds to the diploma, which can be replaced by work experience or associated with it. In this respect, collective agreements in both countries provide a frame of reference within which vocational training serves above all as a criteria for defining the qualifications required by the post.

France, unlike Germany, is characterised by a separation between the structures that create the diplomas and those that recognise them. As a result, French reforms in terms of certification do not necessarily give rise to changes in classifications, and considerable time can elapse between the

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creation of a diploma and its recognition. In addition, the existence of several diplomas on different levels (from the CAP to the BTS) within the same sector contributes to the diversification of forms of recognition from one branch to another. The weight accorded to regulation procedures within the companies seems greater in France than in Germany, where the reference to the "trade" continues to dominate. Nevertheless, the equivalence between the certificate acquired in the dual system and the job that is obtained varies. Thus, certificates in craft occupations, which generally outnumber the needs for replacements in this field, often lead to a semi-skilled post in another activity sector. The formal basis for the recognition of diplomas in France remains the CAP or the BEP (and increasingly, the vocational *baccalauréat*). But the extent of youth unemployment, compounded by the arrival on the labour market of generations of young people with a higher diploma level, is increasing the risks of a drop in status and consequently in the value of these diplomas. The institutional links between diplomas and jobs seem even less clear with the emergence of new certifications such as the Vocational Qualification Certificates (*certificats de qualification professionnelle*, CQP), whose relationship to diplomas conferrred by the national educational system remains uncertain. Other institutional instruments, such as the homologation of titles or accreditation of experience are open to French employers. This multiplication of options is probably the sign of a system suffering from a lack of overall coherence.

In the German case, the question is whether a regulated transition can continue, given the general problems of the job market and above all the growing trend for young people to continue their studies. This is reflected by growing numbers of young former apprentices facing a drop in status despite the fact that they are working in the sector corresponding to their apprenticeship speciality. Nonetheless, as Ingrid Drexel has suggested, the strength of "traditions" in relation to the development of certificates and statutory recognition "will (perhaps) allow the structuring, regulatory effects of the German-style vocational training system to be maintained for a time". In the future, continuing training may emerge as an increasingly indispensable complement to the dual certificate in order to obtain a real skilled worker's position. Ultimately, institutional regulation of the creation of vocational diplomas in each of the two countries must confront a specific form of questioning: in France, this bears more on the conception of the guidelines and, in Germany, on the forms of intervention by the different actors.

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